

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

JOHN M. FIFE, CHICAGO VENTURE  
PARTNERS, L.P., ILIAD RESEARCH AND  
TRADING, L.P., ST. GEORGE  
INVESTMENTS LLC, TONAQUINT, INC.,  
and TYPENEX CO-INVESTMENT, LLC,

Defendants.

Case No. 1:20-cv-05227

Judge Nancy L. Maldonado

Magistrate Judge Heather K. McShain

**DEFENDANT’S SECOND MOTION TO COMPEL DISCOVERY**

Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants”) respectfully file this motion to compel discovery against Plaintiff Securities and Exchange Commission. As set forth in their Memorandum in Support of the Motion, Defendants respectfully request that the Court: (1) order the Commission to produce all documents responsive to Requests for Production Nos. 60, 67, and 77; (2) order the Commission to produce a complete response to Interrogatory No. 19; and (3) grant such other and further relief as the Court deems just and proper.

In accordance with Local Rule 37.2, counsel for Defendants (M. Jonathan Seibald and Brian A. Richman) conferred with counsel for the Plaintiff (Eric M. Phillips and Christopher H. White) via video conference on September 27, 2023 at 2:30 CT in a good-faith effort to resolve the differences raised in this motion, but were unable to reach an accord.

Dated: September 29, 2023

Respectfully submitted,

*/s/ Helgi C. Walker*

Michael J. Diver  
Elliott M. Bacon  
KATTEN MUCHIN ROSENMAN LLP  
525 West Monroe Street  
Chicago, IL 60661  
(312) 902-5200  
michael.diver@katten.com

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Helgi C. Walker\*  
Brian A. Richman\*  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
(202) 955-8500  
hwalker@gibsondunn.com

Barry Goldsmith\*  
M. Jonathan Seibald\*  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166-0193  
(212) 351-2440  
bgoldsmith@gibsondunn.com

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\* *pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2023, I electronically filed a copy of the foregoing document through the Court's CM/ECF System, which will send notifications of the filing to all counsel of record.

/s/ Helgi C. Walker